1 2 3 4 5 6 7 8 9	TONY WEST Assistant Attorney General MELINDA HAAG United States Attorney ELIZABETH J. SHAPIRO Deputy Branch Director, Federal Programs Branch Civil Division NICHOLAS CARTIER, CA Bar #235858 Trial Attorney, Federal Programs Branch Civil Division 20 Massachusetts Ave NW, 7224 PO Box 883 (US Mail) Washington, DC 20530 Tel: 202-616-8351 Fax: 202-616-8470 email: nicholas.cartier@usdoj.gov Attorneys for Defendant		
11	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA		
12)		
13	ELECTRONIC FRONTIER,) FOUNDATION) Civil Action No. 10cv04892 (RS)		
14	Plaintiff,)		
15) STIPULATION TO ALTER) DEADLINE FOR SUBMITTING		
16	DEPARTMENT OF JUSTICE,) JOINT REPORT FEDERAL BUREAU OF)		
17	INVESTIGATION, AND DRUG ENFORCEMENT AGENCY, Ourrent Date: March 10, 2011 Time: 10:00 a.m.		
18	Courtroom: 3, 17 th Floor		
	Defendants.)		
19			
20	The Court has ordered the parties to meet and confer in an attempt to negotiate a mutually-		
21	agreeable processing schedule with respect to plaintiff's two FOIA requests and to submit a joint		
22	report on February 28, 2011, informing the Court of the result of the negotiations. See 2/17/11		
23	Order (Dkt. No. 22). On February 24, 2011, the parties engaged in an initial telephonic meet and		
24	confer. However, because agency counsel for the Drug Enforcement Agency is out of the office		
25	until February 28, 2011, the parties believe that a short extension of the deadline for submitting		
26	the joint report is appropriate.		
27			
28	Stip. to Alter Deadline for Submitting Joint Report No. 10-04892 (RS)		

1	Given that the parties' Joint Case Ma	nagement Conference Statement is due on March 4,	
2	2011, see 1/5/11 Order (Dkt. No. 15), the parties hereby stipulate and respectfully move that they		
3	be permitted to submit the report regarding the	heir efforts to negotiate a processing schedule on	
4	March 4 as part of the Joint Case Manageme	nt Conference Statement.	
5	In addition, the parties hereby stipul	ate to allow Government counsel, Nicholas Cartier,	
6	who works in Washington, D.C., to appear telephonically at the Case Management Conference		
7	currently scheduled for March 10, 2011.		
8			
9	DATED: February 24, 2011	/s/ Nicholas Cartier NICHOLAS CARTIER, CA Bar #235858	
0		Trial Attorney, Federal Programs Branch Civil Division	
1		20 Massachusetts Ave NW, 7224 Washington, DC 20044	
12		Tel: 202-616-8351 Fax: 202-616-8470	
13		email: nicholas.cartier@usdoj.gov	
14		Attorney for Defendant	
15		Thiomey for Defendant	
16	DATED: February 24, 2011	/s/ Jennifer Lynch	
17		ELECTRONIC FRONTIER FOUNDATION Jennifer Lynch, Esq. (240701)	
18		454 Shotwell Street San Francisco, CA 94110	
19		Telephone: (415) 436-9333 Facsimile: (415) 436-9993	
20		Attorney for Plaintiff	
21			
22			
23	PURSUANT TO STIPULATION, IT IS S	SO ORDERED	
24	DATED:		
25		RICHARD SEEBORG United States District Judge	
26			
27			
28	Stip. to Alter Deadline for Submitting Joint Report	- 2 - No. 10-04892 (RS)	

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4	GENERAL ORDER NO. 45(X) CERTIFICATION
5	I attest that I have obtained the concurrence of Jennifer Lynch, counsel for Plaintiff, in
6	the filing of this document.
7	/s/ Nicholas Cartier NICHOLAS CARTIER
8	NICHOLAS CARTIER
9	
10	
11	
12	<u>CERTIFICATE OF SERVICE</u>
13	I hereby certify that on February 24, 2011, I caused a copy of the foregoing to be served
14	on counsel for Plaintiff via the Court's ECF system.
15	
16	/s/ Nicholas Cartier
17	NICHOLAS CARTIER
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28	Stip. to Alter Deadline for Submitting Joint Report No. 10-04892 (RS)